

Arameh Z. O'Boyle (SBN 239495)  
azoboyle@mintz.com  
Esteban Morales Fabila (SBN 273948)  
emorales@mintz.com  
MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO P.C.  
2049 Century Park East, Suite 300  
Los Angeles, CA 90067  
Telephone: (310) 586-3200  
Facsimile: (310) 586-3202

*[Additional Defendants' Counsel continued on next page]*

*Attorneys for Defendants MindGeek  
S.à r.l., MG Freesites Ltd, MG Premium  
Ltd, MindGeek USA Incorporated, MG  
Global Entertainment Inc., and 9219-  
1568 Quebec Inc.*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

K.A.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;  
MG FREESITES LTD, a foreign entity;  
MINDGEEK USA INCORPORATED, a  
Delaware corporation; MG PREMIUM  
LTD, a foreign entity; MG GLOBAL  
ENTERTAINMENT INC., a Delaware  
corporation; 9219-1568 QUEBEC, INC.,  
a foreign entity; BERND BERGMAIR, a  
foreign individual; FERAS ANTOON, a  
foreign individual; DAVID TASSILLO,  
a foreign individual; VISA INC., a  
Delaware corporation; REDWOOD  
CAPITAL MANAGEMENT, LLC, a  
Delaware limited liability company;  
REDWOOD DOE FUNDS 1-7;  
COLBECK CAPITAL  
MANAGEMENT, LLC, a Delaware  
limited liability company; COLBECK  
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04786-WLH-ADS

**DEFENDANTS MINDGEEK  
S.À R.L., MG FREESITES LTD,  
MG PREMIUM LTD, MINDGEEK  
USA INCORPORATED, MG  
GLOBAL ENTERTAINMENT INC.,  
AND 9219-1568 QUEBEC INC.'S  
CIVIL LOCAL RULE 79-5.2.2  
APPLICATION FOR LEAVE TO  
FILE DOCUMENTS UNDER SEAL**

[Filed concurrently with Declaration of  
Peter A. Biagetti; Proposed Order]

Complaint Filed: June 7, 2024  
Trial Date: None Set

1 [Additional Defendants' Counsel continued from caption page]

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3 Seth R. Goldman (*pro hac vice app. forthcoming*)  
4 srgoldman@mintz.com  
5 MINTZ, LEVIN, COHN, FERRIS,  
6 GLOVSKY AND POPEO, P.C.  
7 919 Third Avenue  
8 New York, NY 10022  
9 Telephone: (212) 692-6845  
10 Facsimile: (212) 983-3115

11  
12 Peter A. Biagetti (*admitted pro hac vice*)  
13 pabiagetti@mintz.com  
14 MINTZ, LEVIN, COHN, FERRIS,  
15 GLOVSKY AND POPEO, P.C.  
16 One Financial Center  
17 Boston, MA 02111  
18 Telephone: (617) 542-6000  
19 Facsimile: (617) 542-2241  
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1 Pursuant to Local Rule 79-5.2.2, Defendants MindGeek, S.à r.l., MG  
2 Freesites Ltd, MG Premium Ltd, MindGeek USA Incorporated, MG Global  
3 Entertainment Inc., and 9219-1568 Quebec Inc. (collectively the “MindGeek  
4 Defendants”) respectfully apply for an order sealing portions of the materials  
5 described below that are filed in connection with the MindGeek Defendants’  
6 Omnibus Motion to Dismiss Plaintiff’s Complaint with prejudice (the “Motion”):

7 1. The Omnibus Memorandum of Points and Authorities in Support of  
8 the Motion (“MPA”); and

9 2. The Declaration of Andreas Alkiviades Andreou in Support of the  
10 MindGeek Defendants’ Motion (“Andreou Declaration”).

11 As set forth in the accompanying Declaration of Peter A. Biagetti, the MPA  
12 and the Andreou Declaration contain non-public, proprietary information and trade  
13 secrets related to the financial operation of the MindGeek Defendants’ businesses.

14 The information the MindGeek Defendants seek to file under seal also is  
15 derived from documents that have been designated “CONFIDENTIAL” and/or  
16 “HIGHLY CONFIDENTIAL” by the MindGeek Defendants under the Protective  
17 Order entered by the Court on October 14, 2022 in the related case, *Fleites v.*  
18 *MindGeek S.à r.l., et al.*, Case No. 2:21-cv-4920-WLH-ADS (Dkt. 187) and is  
19 subject to the MindGeek Defendants’ Application to Seal pending in that matter  
20 (Dkt. 445).

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2 Dated: October 30, 2024

Respectfully submitted,

3 MINTZ LEVIN COHN FERRIS GLOVSKY  
4 AND POPEO, P.C.

5 /s/ Peter A. Biagetti

Seth R. Goldman (*pro hac vice app. forthcoming*)

6 Peter A. Biagetti (*admitted pro hac vice*)

7 Arameh Z. O'Boyle

Esteban Morales Fabila

8 Attorneys for Defendants

MindGeek S.à r.l., MG Freesites Ltd, MG

9 Premium Ltd, MindGeek USA Incorporated, MG

Global Entertainment Inc., and 9219-1568

10 Quebec Inc.  
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